

**MCDONNELL AIRCRAFT COMPANY**

Box 516, Saint Louis, Missouri 63166 (314) 232-0232

2 March 1981

U.S. Environmental Protection Agency  
Region VII  
Enforcement Division  
324 East 11th Street  
Kansas City, Missouri 64106  
Attn: Michael J. Sanderson

REGISTERED MAIL - RETURN RECEIPT

Enclosure: EPA Letter dated February 23, 1981, L. Jacobs (EPA) to  
J. Patterson (MDC)

Dear Mr. Sanderson:

This letter is in response to the enclosure. The answers to your questions are as follows:

Question "1. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since November 19, 1980?"

Answer None

Question "2. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since January 16, 1981?"

Answer None

**MCDONNELL DOUGLAS**



R00144153  
RCRA RECORDS CENTER

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2 March 1981

Question     "3. Please indicate why you have not submitted a  
Part A Permit Application (Forms 1 and 3) under  
RCRA."

Answer       We have not submitted Part A Permit Application (Forms 1  
and 3) because we do not treat, store or dispose of any  
hazardous wastes at this facility. When we filed the  
Notification of Hazardous Waste Activity form (8700-12)  
in August 1980, we checked Box "C" (treat/store/dispose).  
The reason that we checked this box was that we do  
store PCB liquids in compliance with "TSCA" regulations.  
The Federal Register of May 19, 1980, page 33118,  
Appendix B, #18, indicated that PCB regulations would  
be promulgated in Fall 1980. We wanted to be assured  
that our PCB storage area would be properly registered,  
since we anticipated PCB listing prior to November 19,  
1980. When the November 18, 1980 date arrived, and  
EPA had not promulgated any RCRA PCB regulations, we  
did not file for a storage permit for this facility  
since what we store is not yet RCRA regulated.

If you have any questions on this matter, please contact us.

Sincerely yours,

MCDONNELL DOUGLAS CORPORATION



Jerome C. Patterson  
Section Manager  
Environmental Pollution Control  
Dept. 191C, Bldg. 107  
Phone (314) 232-3319

JCP:slh



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

REC'D  
25 FEB 81  
JP

FEB 23 1981

Jerome Patterson  
McDonnell Douglas Corp - St. Louis Bldg 72  
P. O. Box 516  
St. Louis, Missouri 63166

Dear Mr. Patterson:

EPA I.D. No. MOD000818922

Facility Address:

Your firm has notified as a treatment, storage, or disposal facility, pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA). That notification was required following the May 19, 1980, and July 16, 1980, promulgation of regulations, which included the identification and listings of hazardous wastes (40 CFR Part 261) under the authority of Section 3001 of RCRA.

The May 19, 1980, regulations have been amended numerous times since that date as follows: July 16, 1980 (Federal Register, Vol. 45, p. 47832); October 30, 1980 (Federal Register, Vol. 45, p. 72024); November 12, 1980 (Federal Register, Vol. 45, p. 74884); November 17, 1980 (Federal Register, Vol. 45, p. 76074); November 19, 1980 (Federal Register, Vol. 45, p. 76618); and November 25, 1980 (Federal Register, Vol. 45, p. 78524). These amendments included changes in the identification and listing of regulated hazardous wastes as well as expansion of those facilities that are exempt from the specific permit requirements of 40 CFR Part 265 but are subject to 40 CFR Part 266 and Part 122.26, permits-by-rule.

According to our records, your firm's Notification of Hazardous Waste Activity form (8700-12) shows your facility stores (over 90 days), treats or disposes of hazardous wastes at the location noted. Thus, your firm should have filed a Part A Permit Application by November 19, 1980, or, January 16, 1981. There is no record at the EPA that you have submitted such an application. Therefore, pursuant to the authority of Section 3007 of RCRA, you are hereby requested to provide the answers to the following questions:

1. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since November 19, 1980?
2. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since January 16, 1981?

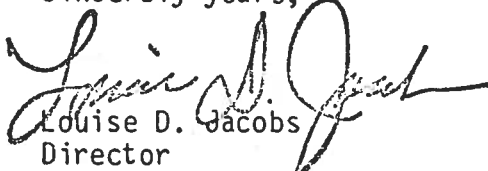
3. Please indicate why you have not submitted a Part A Permit Application (Forms 1 and 3) under RCRA.

4. If you have submitted your Part A Permit Application, on what date did you submit it? Was it addressed to the U.S. EPA, Region VII, P.O. Box 15606, Kansas City, Missouri, 64106? In addition, please forward a copy of Forms 1 and 3 of the Permit Application.

This information is required within 15 days of receipt of this letter and should be directed to Michael J. Sanderson, Enforcement Division, U.S. Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106. Providing the information requested does not satisfy the permit application requirement of RCRA.

If you have any questions on this matter, please contact David Doyle at the address set forth above or by telephone at (816) 374-6248 or 374-2576

Sincerely yours,

  
Louise D. Jacobs  
Director  
Enforcement Division  
Region VII

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MAR 11 15 52 PM '81  
KANSAS CITY MO.  
REGIONAL OFFICE  
EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

FEB 23 1981

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According to our records, your firm's Notification of Hazardous Waste Activity form (8700-12) shows your facility stores (over 90 days), treats or disposes of hazardous wastes at the location noted. Thus, your firm should have filed a Part A Permit Application by November 19, 1980, or, January 16, 1981. There is no record at the EPA that you have submitted such an application. Therefore, pursuant to the authority of Section 3007 of RCRA, you are hereby requested to provide the answers to the following questions:

1. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since November 19, 1980?

2. What are the specific types and amounts of hazardous wastes treated, stored or disposed of at the subject facility since January 16, 1981?

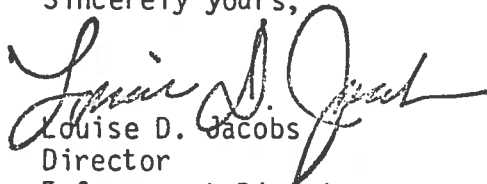
3. Please indicate why you have not submitted a Part A Permit Application (Forms 1 and 3) under RCRA.

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